

I file the following comments regarding NPRM ET 02-98.

The ARRL's petition is based upon arguments that propagation and interference conditions in the 3500 kHz and 7000 kHz bands could hinder effective amateur HF communications, and provides substantiation, through documented experimentation, that another frequency band assignment in the 5000 kHz range can effectively mitigate these arguments. I agree with the basis for this additional spectrum request and support it with the following additional recommendation.

I believe additional interference mitigation would be greatly served by applying the provisions of emissions segmentation, as has been applied to all other amateur HF bands from 3.5 MHz through 29.7 MHz. Such segmentation could be highly critical in times of a National (and/or international) communications emergency when both narrow-band and wide-band emission technologies would be employed simultaneously to augment one another.

I recommend the Commission incorporate narrow-band/wide-band emissions segmentation, as in CFR 47, 97.305, when making its final ruling on this proposal. Further, I recommend that the "tradition" of assigning narrow-band emissions to the lower portion of the new allocation be maintained in proportion to that assigned on the other HF bands.

Respectfully,
Dave Bowker, K1FK
Fort Kent, ME